

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF QWEST CORPORATION FOR)	
ISSUANCE BY THE COMMISSION OF AN)	Application NUSF-7.07
ORDER WAIVING CERTAIN)	
REQUIREMENTS IN THE OPINION AND)	
FINDINGS IN APPLICATION NO. C-1628)	
ASSOCIATED WITH THE NUSF SUPPORT)	
CALCULATION IN THE TRANSITION)	
PERIOD)	

**REPLY TO QWEST CORPORATION'S RESPONSE
TO PETITION FOR FORMAL INTERVENTION**

The Rural Independent Companies¹ (the "Companies") file this Reply to the Response of Qwest Corporation ("Qwest") regarding the Companies' Petition for Formal Intervention. Qwest makes two "requests" in its filing.

1. Qwest requests that a protective order be entered based upon the protective order entered by the Commission in Docket C-2516, and that no additional copies of Qwest documentation be made by the Commission or any party; and
2. Qwest requests a stipulation regarding interventions in all future NUSF-7 proceedings.

The Companies file this Reply requesting that the Commission grant the Companies' Petition for Intervention and enter the protective order previously submitted to the Commission by the Companies.

The Companies Meet the Standard for Intervention and Qwest's Response is Improper

The Commission's procedure rules set forth the standard for granting a petition for intervention. Specifically, Nebraska Administrative Code Title 291, Chapter 1 Section 015.01 provides that:

¹ Arlington Telephone Company, The Blair Telephone Company, Cambridge Telephone Company, Clarks Telecommunications Co., Consolidated Telco, Inc., Consolidated Telcom, Inc., Consolidated Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc, Hershey Cooperative Telephone Co., K&M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telecom Inc., and Three River Telco.

Any person who has an interest in any proceeding pending before the Commission, but who does not desire to file a formal protest, may file a Petition of Formal Intervention. Such person shall be designated as a "formal intervenor," and shall become a party to the proceeding.

The Petition for Intervention filed by the Companies meets this standard. See Petition for Intervention filed on February 21, 2006.

Qwest requests that the Companies stipulate to a finding regarding future interventions in some potential future proceedings. This request has no basis in current Commission procedure and is not a requirement of current Commission procedure. The Companies believe that each proceeding and each petition should be evaluated separately. In this proceeding, that evaluation leads to the conclusion that intervention is proper. Consequently, the Commission should allow the intervention of the Companies based upon the Commission's procedure rules and disregard Qwest's request.

The Commission Should Enter the Protective Order Provided by the Companies

The Companies, attempting to protect confidential information, sent a draft protective order to the Commission and Qwest on February 27, 2006. This draft protective order was based upon prior protective orders entered by the Commission. A review of the current draft reveals that the draft is very similar to the form used by the Commission on July 11, 2001, in Docket C-2516. However, the draft protective order has evolved over the last four years as various parties have made changes to the form. The draft protective order sent by the Companies was revised to reflect the current proceeding and the Companies believe that the form adequately protects Qwest's information. The Companies are unsure if Qwest has reviewed the draft protective order, but Qwest has provided no specific comments to the Companies regarding the language in the draft protective order.

It appears, based upon Qwest's statements, that Qwest is unaware that the draft protective order is the current evolution of the C-2516 protective order. The Companies assume that Qwest is

unwilling to review the protective order and renew its request that the Commission enter the draft order and allow this matter to proceed.

WHEREFORE, the Companies respectfully request that the Commission grant the Companies' Petition for Formal Intervention and enter the draft protective order previously submitted to the Commission.

DATED this 13th day of March 2006.

Respectfully submitted,

THE RURAL INDEPENDENT
COMPANIES

Arlington Telephone Company
The Blair Telephone Company,
Cambridge Telephone Company,
Clarks Telecommunications Co.,
Consolidated Telco, Inc.
Consolidated Telcom, Inc.
Consolidated Telephone Company,
Eastern Nebraska Telephone Company,
Great Plains Communications, Inc.,
Hartington Telecommunications Co., Inc,
Hershey Cooperative Telephone Co.,
K&M Telephone Company, Inc.,
The Nebraska Central Telephone Company,
Northeast Nebraska Telephone Company,
Rock County Telephone Company,
Stanton Telecom Inc., and
Three River Telco

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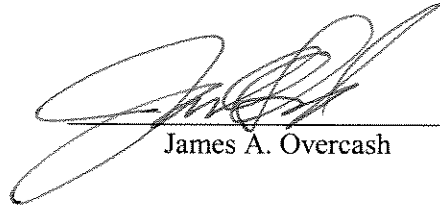
CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing **Reply to Qwest Corporation's Response to Petition for Formal Intervention** were sent by First-Class U.S. Mail and electronic mail on March 13, 2006, to the following:

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